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ATTORNEYS FOR PLAINTIFFS

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

CARLIE SHERMAN, and AMANDA NASH;
on Behalf of themselves and all similarly
situated persons,

CASE NO. 20-cv-215-S

PLAINTIFFS,

v.

TRINITY TEEN SOLUTIONS, INC.,
a Wyoming corporation; **ANGELA C.**

WOODWARD, JERRY D. WOODWARD;
KARA WOODWARD; KYLE WOODWARD,
And **DALLY-UP, LLC**, a Wyoming limited liability
Corporation,

DEFENDANTS.

**PLAINTIFFS' RESPONSE TO DEFENDANT'S REQUEST FOR STATUS
CONFERENCE (ECF 326) AND NOTICE OF MEDIATION – FEBRUARY 27, 2025**

COME NOW the Plaintiffs, Carlie Sherman and Amanda Nash, on behalf of themselves and all similarly situated persons, by and through their undersigned attorneys, and hereby responds to Defendants' Request for Status Conference (ECF 326) by stating the following:

On January 16, 2025, Defense counsel consulted with Class Counsel on participating in mediation with the Honorable Irma E. Gonzalez (Ret.) former Chief Judge of the United States District Court for the Southern District of California. This was a mediator previously proposed by Class Counsel months ago. This request came out of the blue, as Defendants had largely ignored prior attempts to schedule mediation by Class Counsel.

On that same day, Class Counsel agreed to the mediation and requested Defense Counsel join Class Counsel in filing a notice to the Court of the pending mediation.

On January 22, 2025, at 2:00 p.m. Plaintiff's counsel agreed to split the cost of mediation and informed Judge Gonzalez's business manager at JAMS of the agreement.

On January 22, 2025, at 3:01 p.m. Defense Counsel, Lillian Alves, for the first time transmitted a draft of her clients' request for status conference with this Court that indicated that the Defendants could not resolve the claims in mediation without a resolution to the expert issue in this case.

On January 22, 2025, at 3:18 p.m., undersigned counsel, responded to Ms. Alves that her client had pushed for mediation out of the blue and withheld information that Defendants appeared to lack authority to settle this matter without a ruling from this Court. Class counsel sought clarity which was ignored. Class Counsel indicated that they were aware of the Declaratory Action filed by Markel against Trinity Teen Solutions and that they agreed to the mediation knowing that both the expert issue and the declaratory action would likely not be resolved by the time mediation occurred.

On January 24, 2025, Defendants filed their modified request for a status conference (ECF 326) which removed their original statement that “Defendants cannot resolve the claims in mediation or schedule the remainder of the case until the concerns they have raised are addressed.” Counsel filed this without responding to Class Counsel’s concerns.

Class Counsel has sought clarification from Defendants as to whether they have authority to resolve this matter without a ruling by the Court and have only been informed that their client still wishes to mediate.

Class Counsel believe that this Court is capable of controlling its own docket and want to allow this Court the necessary time to properly research the expert issue before making its ruling. Class Counsel believe that a status conference is not necessary in this matter.

Respectfully submitted,

By: /s/Craig A. Edgington

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CERTIFICATE OF SERVICE

This is to certify that on the 24th day of January 2025, a true and correct copy of the foregoing was served upon counsel as follows:

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